

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

LOWTECH STUDIOS, LLC,

Plaintiff,

v.

KOOAPPS LLC, JONATHAN CHANG, and  
CHUN-KAI WANG,

Defendants.

CASE NO.: 1:23-cv-1437-DAE

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KOOAPPS INC.,

Counterclaim-Plaintiff,

v.

LOWTECH STUDIOS, LLC and STEVEN  
HOWSE,

Counterclaim-Defendants.

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**KOOAPPS INC.'S MOTION TO SEAL DOCUMENTS**

Pursuant to Civil Local Rule 5.2 and Section 13 of the parties' Agreed Amended Confidentiality and Protective Order, entered by this Court on March 11, 2025 (Dkt. 81, "Protective Order"), Defendant and Counterclaim-Plaintiff Kooapps Inc., f/k/a Kooapps LLC ("Kooapps") hereby submits its Motion to Seal Documents previously submitted to the Court on May 7, 2025 as demonstratives to be used at the hearing scheduled for May 8, 2025 ("Motion").

Kooapps brings this Motion because it seeks to use, as demonstratives during its oral argument, documents that have been designated by Plaintiff and Counterclaim-Defendant Lowtech Studios LLC ("Lowtech") and Counterclaim-Defendant Steven Howse ("Howse") (collectively, "Counterclaim-Defendants") as "ATTORNEYS' EYES ONLY" pursuant to the parties' Protective Order. Specifically, Kooapps requests that the eight excerpts from LOWTECH\_10054938, LOWTECH\_10054942, LOWTECH\_10054943, and LOWTECH\_10054947 be sealed, as the excerpts contain information Lowtech and/or Howse has deemed to fall within the purview of the parties' Protective Order ("Designated Materials"). Lowtech consents to this Motion.

Respectfully submitted,

Dated: May 7, 2025

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

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*Attorneys for Defendant/Counterclaim Plaintiff*  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on May 7, 2025, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system.

/s/ Eli B. Richlin  
Eli B. Richlin

*Attorneys for Defendant/Counterclaim-  
Plaintiff Kooapps Inc.*